

Exhibit 46

SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS

Case No.: 4:22-md-03047-YGR
MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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7
 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10 **IN RE: SOCIAL MEDIA ADOLESCENT**
 11 **ADDICTION/PERSONAL INJURY**
 12 **PRODUCTS LIABILITY LITIGATION,**

13 **THIS DOCUMENT RELATES TO:**

14 Irvington Public Schools v. Meta Platforms
 15 Inc., et al.

16 Member Case No.: 4:23-cv-1467

Case No. 4:22-MD-03047-YGR

MDL No. 3047

AFFIDAVIT OF DR. APRIL VAUSS

18 My name is April Vauss, and I make this declaration based on my personal knowledge.

19 1. I received a Bachelor's degree in Sociology and Anthropology in December 1995 from
 20 Earlham College, a Master's degree in Teaching in June 2001 from Oakland City University, a
 21 Master's degree in Administration in June 2009 from Oakland City University and a Doctorate of
 22 Education in June 2017 from Oakland City University.

23 2. I have 30 years of experience working in Pre-K-12 education.

24 3. I have worked in Irvington School District since 2004.

25 4. I have been the Superintendent of Irvington School District since July 2020.

26 5. In my position as a Superintendent, I oversee the District's mental health infrastructure by
 27 managing and directing counselors, social workers, and other mental health personnel; allocating
 28 and advocating for budgetary resources to expand mental health services; ensuring compliance with

1 state and federal mandates; resolving student conflict; and providing leadership in academic
2 planning and student support initiatives.

3 6. Currently, addressing the effects of social media on scholars is the biggest challenge we
4 face in the Irvington School District. Nearly every scholar who walks into our complex is dealing
5 with an issue related to social media.

6 7. In my experience, I have seen a growing problem of addictive, compulsive and problematic
7 social media use among our scholars. We face a constant battle in dealing with issues that relate to
8 social media use by our scholars.

9 8. I have also observed a rise in scholar anxiety and depression, which I believe is tied to social
10 media. For example, teachers are unable to finish a class day without stopping their scholars' use
11 of a social media site, post on said site, and intervene in disruptions that are caused by something
12 shared on social media. This was not an issue of any kind at the onset of my teaching career. Today,
13 it has taken over the learning space and culture of many schools. There is not a day that goes by
14 that administration does not have to intervene in a social media related event.

16 9. Ultimately, there are numerous negative effects of social media on the scholars in our school
17 District. These effects include, but are not limited to, excessive use of social media which impacts
18 scholar's mental health, emotional well-being as described above, and performance in school,
19 mental health deterioration caused by scholars' use of social media, scholars' use of fake social
20 media accounts which expose children to dangerous situations on social media, bullying and
21 harassment that occurs on social media platforms and spills over into the school environment,
22 increased social comparisons, and fear of missing out, or "FOMO."

24 10. Importantly, I have observed that the impacts of social media on scholars' well-being are
25 unique to social media use.

1 11. I have observed that when a scholar is tagged in images that are not realistic or do not
2 demonstrate a teenage girl's reality, but that nonetheless receive likes, many scholars self-esteem is
3 diminished.

4 12. Relatedly, we have observed verbal and physical altercations occur. For example, as a result
5 of likes made to Doechii vs. Beyonce. The contention was that no way were the likes legitimate
6 because Beyonce was beautiful. This argument took over a class period. The features on social
7 media were believed to be make believe for Doechii and real for Beyonce.

8 13. Similarly, bullying and harassment that occurs on social media platforms exacerbate the
9 issues the District must address, as the bullying and harassment are disseminated further and for
10 longer periods of time than they would be absent a social media platform, and social media
11 emboldens scholars to engage in this type of behavior that does not occur when interacting in
12 person.

13 14. For example, the District is aware of numerous social media accounts that impact its
14 scholars, many of which are related to fighting among the students. While the District is aware of
15 these specific accounts, we believe there are many more in existence and that new accounts are
16 being created regularly, often under slightly altered names, making monitoring and enforcement
17 increasingly difficult.

18 15. Additionally, the District observed various challenges promoted by Defendants' platforms,
19 including but not limited to: (1) Blue Whale Challenge; (2) Blackout Challenge; (3) Cinnamon
20 Challenge; (4) Bird Box Challenge; and (5) Eraser Challenge (6) Vandalize school bathrooms (7)
21 Smack a staff member.

22 16. The time that I have to spend on social media related impacts on students has substantially
23 increased in the nearly twenty-one years that I have worked in the Irvington School District.

1 17. When I first started as a teacher in 2004, less than 5% of my work time with students was
2 spent on social media related concerns. By 2020, that number had risen to around 50%. Now in
3 2025, I spend anywhere from 60 – 65% of my work time addressing social media's impact on
4 students.

5 18. This means I have less time to dedicate to other aspects of my job such. For example, if
6 there was not the social media lure and addiction within the schools, time could be spent on closing
7 the achievement gap for scholars.

9 19. Moreover, while hiring additional counselors would be helpful in addressing the negative
10 impacts that the rising use of social media has on students, the Irvington School District has not
11 been able to increase counselor hiring commensurate with the needs of the student population that
12 has been negatively impacted by social media due to funding constraints.

14 20. I regularly interact with counselors and administrators for children in grades 6 – 12 within
15 the Irvington School District. Based on these interactions, it is my understanding that the counselors
16 spend the majority of their days addressing social media related concerns and that the amount of
17 time counselors have had to spend on social media related concerns has increased substantially over
18 the last several years. Based on my experience and interactions, I believe that, to the best of my
19 current knowledge, Guidance Counselors, Social Workers/HSSCs, and Climate Specialists in the
20 District spend 85 % of their time today on issues related to social media. This has increased from
21 approximately 25% in 2016.

23 21. Based on my experience and interactions, I believe that, to the best of my current
24 knowledge, School Psychologists in the District spend 50 % of their time today on issues related to
25 social media. This has increased from approximately 15% in 2016.

22. Based on my experience and interactions, I believe that, to the best of my current knowledge, Nurses in the District spend 20 % of their time today on issues related to social media. This has increased from approximately 5% in 2016.

23. Similarly, District Principals and Assistant Principals report that they spend approximately 80% of their time today dealing with issues related to social media, including disciplinary actions, HIB investigations and the other direct and indirect impacts associated with the scholars' social media use. The time spent today by administrators has increased from approximately 30% in 2016.

24. If the demands caused by social media were significantly reduced or did not exist, that time could be allocated to core counseling responsibilities that include but are not limited to: individual counseling sessions; small group counseling sessions; academic appraisal and advisement; college and career advisement; financial aid; scholarship search and application; classroom lessons; workshops for teachers (building classroom connections, how to deal with various students); counseling students who are absent and tardy to school; collaborating with teachers on the needs of students; maintaining student records; and advocate for students during IEP and 504 meetings.

Pursuant to 28 U.S.C. § 1746, I hereby declare and certify, under penalty of perjury, that the foregoing is true and correct.

Executed on May 13, 2025.

Dr. April Vauss

Dr. April Vauss (May 13, 2025 17:26 EDT)

April Vauss

VAUSS AFFIDAVIT FINAL

Final Audit Report

2025-05-13

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